

**V. REMARKS**

Applicants have considered the Office Action with mailing date of July 3, 2006. Claims 1 – 20 are pending in this application. By this amendment, claim 8 has been amended. Applicants do not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

**A. OBJECTION TO CLAIM 8**

The Office has objected to claim 8 based on an informality. Applicants have amended claim 8 to recite, "...the system comprising: ...". Accordingly, Applicants request that the Office withdraw this objection.

**B. REJECTION OF CLAIMS 1-20 UNDER 35 U.S.C. §102(e)**

In the Office Action, claims 1 - 20 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Allen et. al. (U.S. Patent No. 6,904,575 B2), hereinafter "Allen". Applicants do not agree with the Office's interpretation of the claimed invention and respectfully traverse the rejections on the following grounds.

With respect to claims 1, 8 and 15, the Office cites col. 4, lines 40 – 43 in Allen in support of its rejection under 35 U. S. C. §102(e). Applicants assert that Allen does not teach each and every feature of the claimed invention. For example, Applicants assert

that the method in Allen does not teach, *inter alia*, "...generating a redundant via for a target via ...". On the contrary, Allen discloses a method for reducing via shorts by "...[identifying] potentially shorting vias, ..." and "...creating cloned cells ... without the potentially shorting vias...". Col. 1, line 42 – 54. Although the Office cites col. 4, line 55-57 that Allen discloses "... a redundant via is used in place of the faulty via...", Allen does not teach the claimed method of "... generating a redundant via...". In contrast, Allen identifies already existing redundant vias "...that touch and/or approach other vias ... determines if it has an electrically redundant path" in a cell and removes one of the existing redundant via that is faulty. Col. 3, line 53 – 58. No redundant via, however, is generated in the process set out in col. 3, lines 50-64, instead, a cloned cell is created. Applicants further assert that Allen's method of creating a cloned cell does not disclose or teach the claimed method of "...generating a redundant via...". Accordingly, Applicants respectfully request that the Office withdraw this rejection.

With respect to dependent claims 2-7, 9-14 and 16-20, Applicants submit that Allen teaches against, *inter alia*, " ...removing the redundant via for one...and removing the redundant via for the other..." of claims 2, 9 and 16 because col. 5, lines 9 – 11 discloses that "...removal of both vias will violate electrical redundancy rule...safe removal of two vias is unsafe...". Accordingly, Applicants respectfully request that the Office withdraw this rejection.

With respect to remaining dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims 1, 8 and 15 from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each

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and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

#### IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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